

**THE UNITED STATES DISTRICT COURT FOR THE  
NORTHERN DISTRICT OF ILLINOIS, EASTERN DIVISION**

MFB Fertility, Inc.,

Plaintiff,

v.

Action Care Mobile Veterinary Clinic, LLC,

Defendant.

Case No. 1:23-cv-03854

Dist. Judge Harry D. Leinenweber

Mag. Judge Gabriel A. Fuentes

**DECLARATION OF ILYA G. ZLATKIN**

I, Ilya G. Zlatkin, of the Town of Munster, in the State of Indiana, declare as follows:

1. I am an attorney and represent Defendant Action Care Mobile Veterinary Clinic, LLC (“Action Care” or “Defendant”) in connection with the above-captioned lawsuit. I am admitted to practice before all Illinois state courts, all Indiana state courts, the U.S. District Court for the Northern District of Illinois, and the U.S. District Court for the Northern District of Indiana. I am in good standing with all of those courts and have never been subject to professional disciplinary proceedings of any kind.

2. This Declaration is submitted to supplement Action Care’s response to the motion to dismiss counterclaims (“Motion”) filed by Plaintiff MFB Fertility, Inc. (“Plaintiff” or “MFB”). Except as otherwise expressly stated to the contrary, I have personal knowledge of the following facts and, if called as a witness, I could and would competently testify to the assertions contained in this Declaration.

3. Attached hereto as **Exhibit 1** is a true and correct copy of an email string between counsel for the parties on December 18, 2023.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct to the best of my knowledge.

Executed on February 23, 2024, at Munster, Indiana.

Respectfully submitted,

/s/ Ilya G. Zlatkin

Ilya G. Zlatkin

Zlatkin Cann Entertainment

4245 N Knox Ave

Chicago, IL 60641

(312) 809-8022

ilya@zce.law

*Counsel for Defendant Action Care*

*Mobile Veterinary Clinic, LLC*